

1 letters regarding any failure to perform or negative attitude, performance appraisals,  
2 termination or resignations from employment.

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4 **Response to Document Request No. 4:** Plaintiff objects to this request as it does not seek  
5 information admissible at trial or information reasonably likely to lead to the discovery of  
6 information admissible at trial, vague, overly burdensome and grossly invasive into Plaintiff's  
7 private matters unrelated to this lawsuit. Without waiving such objections, Plaintiff does not  
8 have within her custody and/or control copies of former employers personnel files and other  
9 documents. However, Plaintiff has conducted a reasonable search of her personal documents  
10 and produces what documents she has been able to locate within her custody and/or control  
11 responsive to this request by attaching them to these responses. Specifically, Plaintiff has  
12 provided letters of employment, employment records, pay records and cancelled checks that  
13 related to her employment since July 30, 2005.

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15 **Production Request No. 5:** Please produce all documents relating to your contention that  
16 upon receipt of the "letter of concern" "the administration and the Commonwealth's Board of  
17 Education" "contacted Mr. Brewer and tasked him with investigating these concerns.

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19 **Response to Document Request No. 5:** Plaintiff objects to this request as it is overly  
20 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
21 documents already in the custody and/or control of PSS support this contention. Please see the  
22 documents attached hereto, specifically the copies of media reports concerning the "letter of  
23 concern." Furthermore, as discovery in this matter is ongoing and both party and fact witness  
24 depositions have yet to be conducted, Plaintiff reserves the right to update this request, up to  
25 and including at trial, as new documents become known to her.

1 **Production Request No. 6:** Please produce all documents relating to your contention that  
2 Defendant Jim Brewer “formed the erroneous belief that Ms. Black was responsible for  
3 drafting, circulating and/or encouraging others to sign it (“the letter of concern”).  
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5 **Response to Document Request No. 6:** Plaintiff objects to this request as it is overly  
6 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
7 documents already in the custody and/or control of PSS support this contention. Furthermore,  
8 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
9 conducted, Plaintiff reserves the right to update her response to this request, up to and  
10 including at trial, as new documents become known to her.  
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13 **Production Request No. 7:** Please produce all documents relating to your contention that  
14 Defendant Jim Brewer, “acting alone or in concerted [sic] with others, actively interfered with  
15 Ms. Black’s efforts to secure employment at other schools within the PSS system.”  
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18 **Response to Document Request No. 7:** Plaintiff objects to this request as it is overly  
19 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
20 documents already in the custody and/or control of PSS support this contention. Furthermore,  
21 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
22 conducted, Plaintiff reserves the right to update her response to this request, up to and  
23 including at trial, as new documents become known to her.  
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26 **Production Request No. 8:** Please produce all documents relating to your contention that you  
27 exercised or were perceived to have exercised your right to free speech while an employee at  
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1 Hopwood Junior High School.

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3 **Response to Document Request No. 8:** Plaintiff objects to this request as it is overly  
4 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
5 documents already in the custody and/or control of PSS support this contention. Furthermore,  
6 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
7 conducted, Plaintiff reserves the right to update her response to this request, up to and  
8 including at trial, as new documents become known to her.  
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11 **Production Request No. 9:** Please produce all documents relating to your contention that  
12 "the actions of Mr. Brewer and/or PSS deprived Ms. Black of rights guaranteed by the  
13 Constitution, including, but not limited to her right under Article 1 Section 5 to due process of  
14 law and her right of individual privacy Article 1 Section 10."  
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16 **Response to Document Request No. 9:** Plaintiff objects to this request as it is overly  
17 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
18 documents already in the custody and/or control of PSS support this contention. Furthermore,  
19 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
20 conducted, Plaintiff reserves the right to update her response to this request, up to and  
21 including at trial, as new documents become known to her.  
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24 **Production Request No. 10:** Please produce all documents relating to your contention that  
25 "the conduct of Mr. Brewer and PSS caused Ms. Black severe anxiety that continues to this  
26 date, making her constantly apprehensive and fearful that she will not be able to secure  
27 employment and consequently have no means by which to support herself."  
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1 **Response to Document Request No. 10:** Plaintiff objects to this request as it is overly  
2 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
3 documents already in the custody and/or control of PSS support this contention. Furthermore,  
4 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
5 conducted, Plaintiff reserves the right to update her response to this request, up to and  
6 including at trial, as new documents become known to her.  
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9 **Production Request No. 11:** Please produce all documents relating to your contention that  
10 Plaintiff is entitled to damages as a result of any act or omission of PSS or its employees,  
11 including financial, emotional, and punitive damages and attorneys fees or other losses.  
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13 **Response to Document Request No. 11:** Plaintiff objects to this request as it is overly  
14 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
15 documents already in the custody and/or control of PSS support this contention. Furthermore,  
16 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
17 conducted, Plaintiff reserves the right to update her response to this request, up to and  
18 including at trial, as new documents become known to her.  
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21 **Production Request No. 12:** Please produce all documents relating to the nature and extent of  
22 any injury or damage, including financial, emotional, physical or other injuries that Plaintiff  
23 contends that she suffered by any act or omission of PSS or any PSS employee.  
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25 **Response to Document Request No. 12:** Plaintiff objects to this request as it is overly  
26 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
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1 documents already in the custody and/or control of PSS support this contention. Furthermore,  
2 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
3 conducted, Plaintiff reserves the right to update her response to this request, up to and  
4 including at trial, as new documents become known to her. Without waiving such objections,  
5 Plaintiff does not retain her medical records, but will sign any reasonable release that will  
6 enable PSS to gather these documents provided that a copy of any documents copied from  
7 Plaintiff's medical records and retained by PSS is given to Plaintiff. Please see the documents  
8 produced herewith.  
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11 **Production Request No. 13:** Please produce all documents, including but not limited to  
12 medical records and bills, of any health care provider who provided or is currently providing  
13 treatment to Plaintiff for any physical, mental or emotional condition that was allegedly caused  
14 by an action or inaction of PSS or its employees.  
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16 **Response to Document Request No. 13:** Plaintiff objects to this request as it is overly  
17 broad in that it seeks documents not in the custody and/or control of Plaintiff. Additionally,  
18 documents already in the custody and/or control of PSS support this contention. Furthermore,  
19 as discovery in this matter is ongoing and both party and fact witness depositions have yet to be  
20 conducted, Plaintiff reserves the right to update her response to this request, up to and  
21 including at trial, as new documents become known to her. Without waiving such objections,  
22 Plaintiff does not retain her medical records, but will sign any reasonable release that will  
23 enable PSS to gather these documents provided that a copy of any documents copied from  
24 Plaintiff's medical records and retained by PSS is given to Plaintiff. Please see the documents  
25 produced herewith.  
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